

James Roger Jones

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Department of Environmental Quality
Atten. Ms. Shelley Williams
Regional TMDL Coordinator
P. O. Box 1668
Abingdon, Virginia 24212-1688

Date: April 15, 2008

Re: TMDL development for N&S Fk. of Pound River
Wise County, Virginia

Dear Ms. Williams:

As a concerned citizen and resident of Wise County, I hereby list my comments per the public notice on the TMDL development for the North and south Fork of the Pound River and please excuse my rambling:

1.The report was put together with information that was available. The data collection and model study required a lot of work and I commend you that effort. I would recommend that additional research from Virginia government files documenting past mining and earliest mining be added to the report. Perhaps earlier water or benthic data is available. Past mining practices in pre-SMCRA era was used in these watersheds, and re-mining under SMCRA standards is still ongoing and may continue for some time in the future. A tiered approach similar to Rahall amendment going forward would allow for existing land uses, especially mineral extraction and processing. Since mineral extraction is one of the many existing and designated land uses gong forward and TDS values may remain higher in the watershed than any existing or future unmined and undisturbed watershed; a tiered approached show be allowed while any mining permits present or future are present in the watershed.

2.If additional modeling is going to be done on the watersheds for comparison, then please allow additional time for review and comments.

3.Maybe, I don't understanding the screening comments in the report, please explain. If I understand the comment, then is not excluding the lower values in all the parameters making the averages relatively higher?

4.The reference watershed is too far away. It may not allow for the complex geology of this watershed area with its many faults, synclines and anticlines.

5.The mineral extraction in these watersheds is more closely related to area mining than one or two seam contour mining. In this process more disturbed area is open for more time because lower seam benches are left for spoil disposal from upper seams, allowing for maximizing resource recovery. Maximizing resource recovery is one of the many mandates of the mining regulations. Have you considered different methods of mining and not lumped them together as "mining practices"?

6.There seems to be some concern for high sediment values from mine sites but data does not indicate the same. The largest flood in Wise County was in 1977, but this data is not used. Did this flood deposit sediment or remove sediment? What damage if any was done to the stream banks and the benthic community?

7.How are the economic consequences taking to account when trying to improve stream water aquatic life?

In my opinion, any future implementation plans should allow for and not prohibit present or future coal mineral mining and development in this watershed where one of the major land uses has been historically and currently, mineral extraction.

For, how will Virginia and this nation meet its existing and future energy needs? If the extraction and processing of mineral and the construction of coal power plants is denied, then the regulatory authority has the responsibility to its citizens to state how Virginia's energy needs will be met and at what costs? Utilizing coal can help prevent the coming energy train wreck.

My written comments are provided in duplicate via regular mail and also via email.

Respectfully submitted,

James Roger Jones
Va. P.E. Lic. No. 008101

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